

Form G-4

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

Debtor(s) Randolph E. Fields Case No. 19-19446 Chapter 13

Moving Creditor Harley-Davidson Credit Corp Date Case Filed 07/11/2019

Nature of Relief Sought ☒ Lift Stay ☐ Annual Stay ☒ Other (describe) Co-debtor relief

Date of Confirmation Hearing 09/06/2019 or Date Plan Confirmed 01/31/2020

1. Collateral
 - a. ☐ Home
 - b. ☒ Car Year, Make Model 2008 HARLEY-DAVIDSON FLHTCU ULTRA CLASSIC ELECTRA G, VIN: 1HD1FC4468Y668687
 - c. ☐ Other (describe) _____
2. Balance Owed as of Petition Date \$9,364.31
Total of all other Liens against Collateral _____
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$8,660.00
5. Default
 - a. ☐ Pre-Petition Default
Number of months _____ Amount: _____
 - b. ☒ Post-Petition Default
Number of months 4 Amount: _____
 - i. ☒ On direct payments to the moving creditor
Number of months 4 Amount: \$1,235.40
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount: _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount _____
 - iii. ☒ Rapidly depreciating asset
 - iv. ☐ Other (describe): _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☒ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☒ Other (describe): Failure to pay per contract and confirmed Plan
 - d. Debtor's Statement of Intention regarding the Collateral
 1. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: December 22, 2020

/s/ Wesley T. Kozeny
Counsel for Movant